

February 8, 2006

Writer's Direct Contact
202/887-1510
CTritt@mofo.com

EX PARTE NOTICE

Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92
Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

On February 6, 2006, Kathleen O'Brien Ham, Managing Director, Federal Regulatory Affairs, for T-Mobile USA, Inc. ("T-Mobile"), and the undersigned, also representing T-Mobile, met with Narda Jones, Chief of the Telecommunications Access Policy Division ("TAPD") of the Wireline Competition Bureau, Cathy Carpino, Greg Guice, James Lande and Carol Pomponio, also of the TAPD, to discuss the universal service fund contribution methodology issues raised in the above-referenced proceedings. The views expressed by the T-Mobile representatives during the meeting generally supported the presentation by CTIA-The Wireless Association™ ("CTIA") to the Wireline Competition Bureau on January 25, 2006 and are summarized in the attached presentation, which was distributed at the meeting.

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In accordance with Section 1.1206 of the Commission's rules, this letter and attachment are filed with your office for inclusion in the public record of the above referenced proceeding. If you have any questions regarding this *ex parte* notice, please contact the undersigned.

Sincerely,

/s/ Cheryl A. Tritt
Cheryl A. Tritt
Counsel for T-Mobile USA, Inc.

Attachment

cc: Narda Jones
Cathy Carpino
Greg Guice
James Lande
Carol Pomponio
Kathleen Ham

USF CONTRIBUTION METHODOLOGY TALKING POINTS

- Universal service should be funded in a manner to best meet the goals of universal service. Contribution methodology should ensure the stability and viability of the USF and be equitable, nondiscriminatory and technology neutral.
- T-Mobile has preferred continuation of the revenue-based system for USF contributions, but if the Commission ultimately determines that a telephone number and connections-based contribution methodology is preferable, it must ensure that the new system is fair for carriers and customers. T-Mobile generally supports the CTIA position outlined in January 25, 2006 ex parte presentation.
 - All switched connections should be assessed based only on actual “working” subscriber telephone numbers, and non-switched connections should be assessed based on capacity units.
 - Capacity-based assessments for non-switched connections should be properly calibrated to discourage arbitrage opportunities. T-Mobile supports the capacity tier scheme proposed in the Commission’s 2002 FNPRM, under which the first tier, up to 725 Kbps, would be assessed at a single “unit” capacity rate.
 - Contributions by residential, single line businesses and mobile wireless numbers should be technology neutral and, like capacity-based assessments for non-switched connections, should be equitably structured to avoid market distortions.
 - For example, assessments on wireless family share plans should recognize that the family is an economic unit sharing one “bucket” of minutes and that each family member will need a mobile phone, with its own number, to replace the single wireline phone number formerly used by the entire family. T-Mobile supports CTIA's proposed 50 percent discount.
 - Prepaid wireless numbers also should not be assessed as much as standard wireline numbers. T-Mobile supports CTIA's proposed 50 percent discount.
 - The standard switched number contribution rate would be equivalent to the single unit non-switched connection rate.
 - Carriers without working numbers or end-user connections should continue contributing based on their interstate telecommunications revenues.
 - After a 12 month transition, quarterly revenue reporting should end. Contributors should continue to have the flexibility to recover contribution costs from their end-users, either through line items or as part of overall service charges.
- This approach to a numbers and capacity-based methodology will ensure that all providers of interstate telecommunications contribute on an equitable basis that does not influence consumer choices.